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13 WALMART INC.

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15 **UNITED STATES DISTRICT COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**

17 JOYCE HERNANDEZ, an individual,

18 Plaintiff,

19 v.

20 WALMART, INC., a Delaware
corporation; and DOES 1-50, inclusive,

21 Defendants.

22 Case No. 1:23-cv-01355-KES-SKO

23 **STIPULATION AND ORDER TO**
EXTEND EXPERT DISCOVERY
DEADLINES

24 **(Doc. 36)**

25 Complaint Filed: June 20, 2023
26 Removal Date: September 13, 2023
27 Trial Date: March 10, 2026

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1 **TO THE COURT:**

2 COMES NOW Plaintiff Joyce Hernandez and Defendant Walmart Inc.,
3 (collectively the “Parties”), by and through their counsel of record, and stipulate as
4 follows:

5 WHEREAS, expert discovery is underway;

6 WHEREAS, the current rebuttal expert disclosure date is August 15, 2025, and
7 the expert discovery cutoff date is August 29, 2025;

8 WHEREAS, Defendant’s rebuttal expert is unavailable between August 15 and
9 25, 2025, and has advised that she will need additional time to complete the required
10 report;

11 WHEREAS, both Parties will also need additional time to complete expert
12 depositions due to experts’ availability;

13 WHEREAS, the Parties would like to extend the current deadlines for rebuttal
14 expert disclosures and expert discovery;

15 WHEREAS, the trial date in this matter is not until March 10, 2026;

16 NOW, THEREFORE, to allow for the completion of expert discovery, the Parties
17 stipulate to, and respectfully request, a modification of the expert discovery deadlines,
18 as follows:

- 19 1. An extension of the current rebuttal expert disclosure deadline of August
20 15, 2025 to August 29, 2025.
21 2. An extension of the current expert discovery cut-off date of August 29,
22 2025 to September 12, 2025.

23 IT IS SO STIPULATED.

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1 Dated: August 14, 2025

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, LLP

2 By: Eireann Brooks

3 James T. Conley
4 Brittney L. Turner
5 Eireann E. Brooks
6 *Attorney for Defendant*
7 WALMART, INC.

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9 Dated: August 14, 2025

BROCK & GONZALES, LLP

10 By: /s/ Douglas B. Hayes

11 Douglas B. Hayes
12 Kendall Weaver
13 *Attorneys for Plaintiff*
14 JOYCE HERNANDEZ

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ORDER

Having considered the foregoing Stipulation of the Parties (Doc. 36), and good cause appearing (Fed. R. Civ. P. 16(b)(4)), the Court hereby orders as follows:

The current Scheduling Order (Doc. 24) is hereby modified as follows:

1. The rebuttal expert disclosure deadline is continued to August 29, 2025; and
 2. The expert discovery deadline is continued to September 12, 2025.

All other deadlines in the case schedule (Doc. 33) remain unchanged.

IT IS SO ORDERED.

Dated: August 15, 2025

/s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE